



**Serving Our Clients and Community  
For Over 100 Years**

**JAMES A. KASSIS**  
Certified by the Supreme  
Court of New Jersey as a  
Civil Trial Attorney  
Admitted in NJ and NY  
Direct Line: 973-540-7339  
Email: jak@spsk.com

220 Park Avenue  
PO Box 991  
Florham Park, NJ 07932  
Telephone: 973-539-1000  
Fax: 973-540-7300

[www.spsk.com](http://www.spsk.com)

April 4, 2022

**VIA ECF ONLY**

Honorable Michael A. Hammer, U.S.M.J.  
United States District Court  
Martin Luther King, Jr. Federal Building and  
United States Courthouse  
50 Walnut Street  
Newark, NJ 07101

**Re: Lee Evans vs. Newark City, et al.  
Civil Action No. 2:14-cv-00120  
Our File No. 24090-22**

Dear Judge Hammer:

As per Your Honor's February 8, 2022, Amended Scheduling Order [D.E. 219], please accept this correspondence as the parties' joint letter informing the Court that plaintiff is foregoing retaining expert witnesses. In light of plaintiff's decision, the defendants do not intend to retain any expert witnesses. As such, the parties are ready to proceed to dispositive motion practice.

The parties have conferred and agreed on the following briefing schedule for dispositive motions:

- Defendants to file dispositive motions by May 27, 2022
- Plaintiff to file opposition papers by July 26, 2022
- Defendants to file reply papers by August 9, 2022
- The motion shall be returnable August 15, 2022

We thank the Court for its consideration of this proposed briefing schedule.

Very truly yours,

*/s/ James A. Kassis*  
James A. Kassis

JAK:mda

cc: Victor DiFrancesco, Esq. (via email)  
Jennifer Bonjean, Esq. (via email)  
Michael Vomacka, Esq. (via email)  
Ashley Cohen, Esq. (via email)  
Gary S. Lipshutz, Esq. (via email)

So Ordered:

\_\_\_\_\_  
Honorable Michael A. Hammer, U.S.M.J.